

State Feedback Survey Report

EPA Region 9 Water Division

September 2018

Table of Contents

Introduction.....	4
Executive Summary.....	4
Results	5
Trainings Requested.....	12
Action Items	13

Introduction

EPA Region 9 Water Division (EPA) administered an online survey to garner feedback from each of our primary state partner agencies. The survey focused on three areas: state priorities, EPA's support of state programs, and EPA communication, coordination, and grant administration. This report summarizes results and action item commitments made by EPA to address feedback.

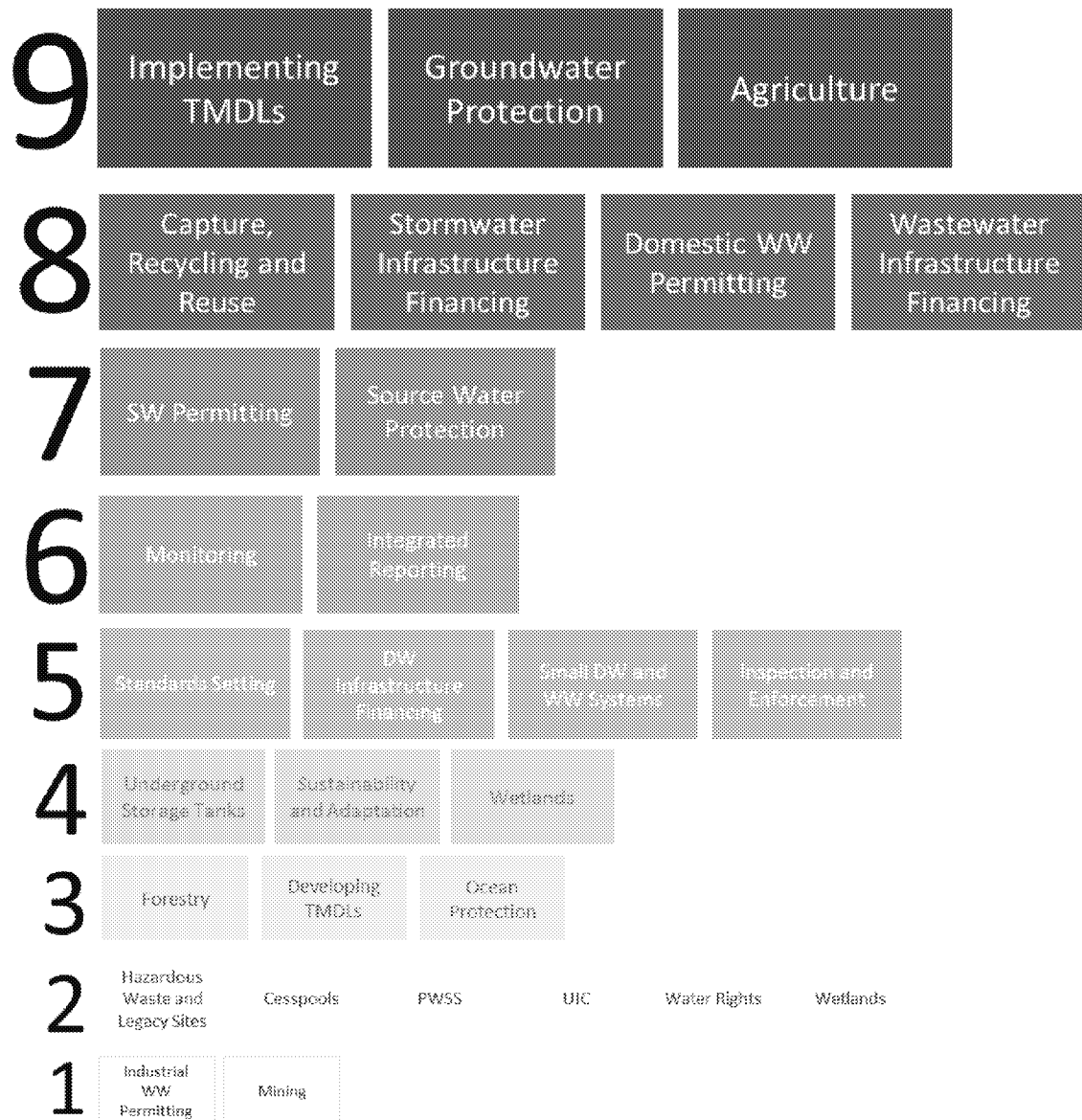
Executive Summary

EPA received 11 responses from 4 states, including Arizona Department of Environmental Quality, Nevada Division of Environmental Protection, two responses from Hawaii Department of Health, and seven responses from six California Regional Water Quality Control Boards (North Coast, Los Angeles, Central Valley, Lahontan, Santa Ana, and San Diego). Responses were received between February and June 2018. After analyzing the survey responses, EPA identified the following results and action items:

- **High Priority Programs.** EPA will work with states to better understand how to support programs they identified as high-priority, including incorporating elements into our strategic planning. The following programs were recognized as high priorities:
 - Implementing TMDLs
 - Groundwater Protection
 - Agriculture
 - Capture, Recycling, and Reuse
 - Wastewater and Stormwater Infrastructure Financing
 - Domestic Wastewater and Stormwater Permitting
 - Source Water Protection
- **EPA Performance.** Generally, states approved of EPA's support of state programs indicating that they were "very satisfied" or "satisfied" in 63% of program areas and "dissatisfied" in only 9% of program areas. Programs that indicated highest EPA approval were for the State Revolving Fund, wastewater permitting, and TMDL development. EPA will follow up on program areas that received lower satisfaction ratings.
- **State Needs.** Areas where states believed EPA should increase their investment include providing technical, training and in-kind support and convening federal, state, and tribal partners. States also expressed a desire to streamline reporting processes. To address these needs, EPA will:
 - Leverage resources to further address high-priority training needs from states.
 - Explore facilitating a regular executive summit of Regional Water Directors.
 - Focus on streamlining grant reporting for programs where requirements were perceived as overly burdensome.
 - Reconsidering ability to offer in-kind contract assistance and support programs with diminishing in-kind.

Results

What programs would you consider your highest priority?



Number corresponds to number of responders who indicated program as “high priority” (out of 11).

Which of these programs could you most benefit from addition EPA technical and/or programmatic support?

Sample Comments:*

"Support for DW small system technical assistance, stormwater infrastructure, and state specific Water Quality Standards." -NV

"Financing **cesspool replacement** in areas impacting groundwater sources of drinking water." -HI

"Financing and technical assistance for **small wastewater and drinking water systems.**" -CA

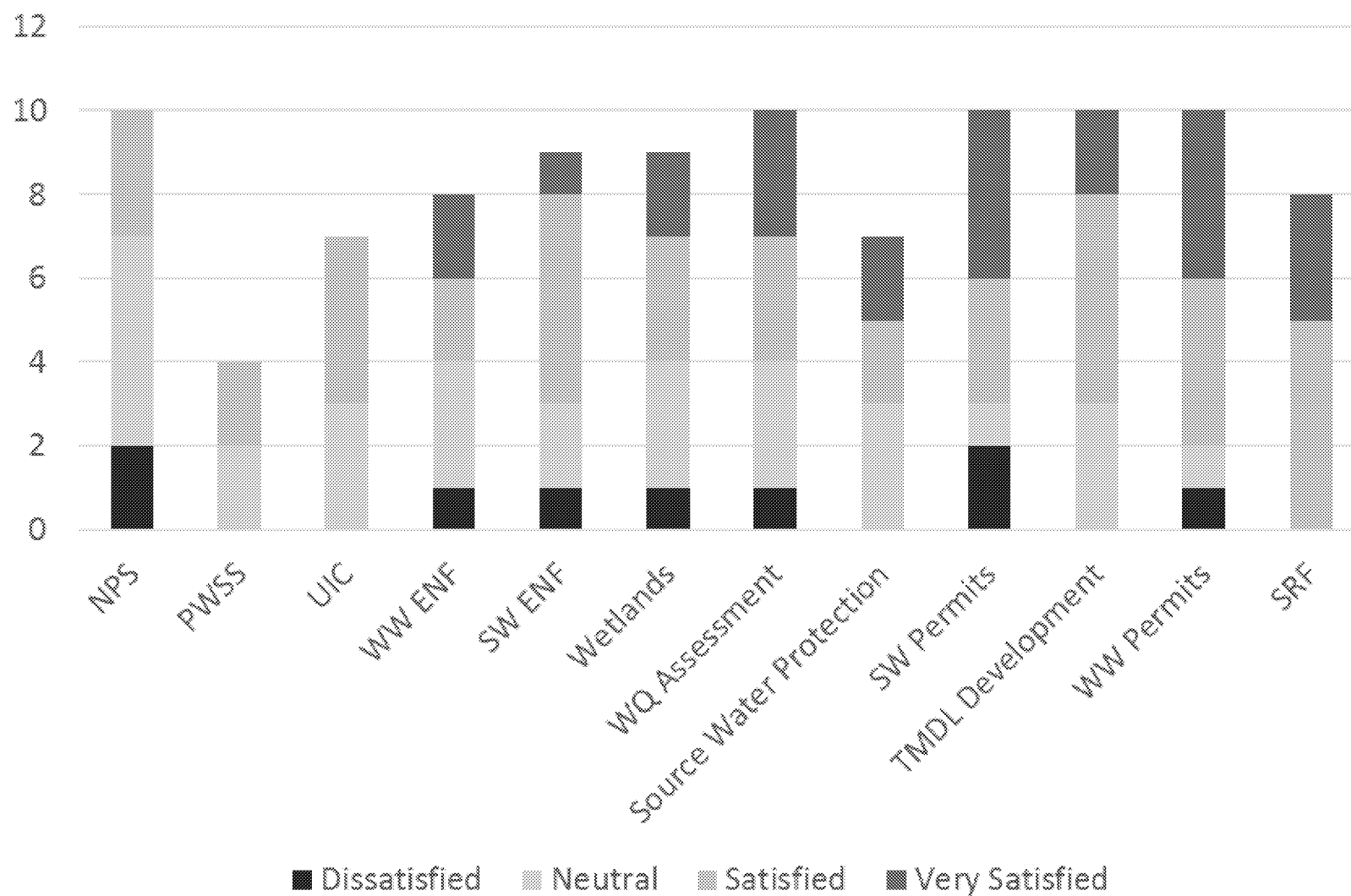
"Implementing **CV-SALTS** and **Delta RMP.**" -CA

"**Contractor support** for minor NPDES permit development and audits of MS4 programs" -CA

"**Development of SSOs** that are reflective of Southern Calif environment." -CA

*All comments are paraphrased.

Please rate how satisfied you are with EPA's technical and programmatic support of the following programs:



Where you rated satisfaction high, what does EPA do well and could do more of?

Sample Comments:*

"Provide support, coordinated assistance, and guidance and help **respond to issues.**" -NV

"Good communication with State on PWSS grant deliverables, collaboration on surface water projection and improvements to SRF workflows." -HI

"Very satisfied with current level of **contract support** in NPDES wastewater permitting and pretreatment." -CA

"**Susan Keydel** has provided support and assistance in the development of watershed based plans and **Peter Kozelka** provides constructive comments on MS4 permit and associated RAA." -CA

"Continued support for **Biological Objectives** and **Bacterial Indicators standards.**" -CA

Where you rated satisfaction low, what could EPA do to improve?

Sample Comments:*

"Impairment listings by EPA are not in agreement with state water quality standards; provide better coordination with state **WQS adoptions/303d reporting.**" -NV

"EPA support is needed to conduct **audits of stormwater programs** as was provided 5 years ago by PG Environmental." -CA

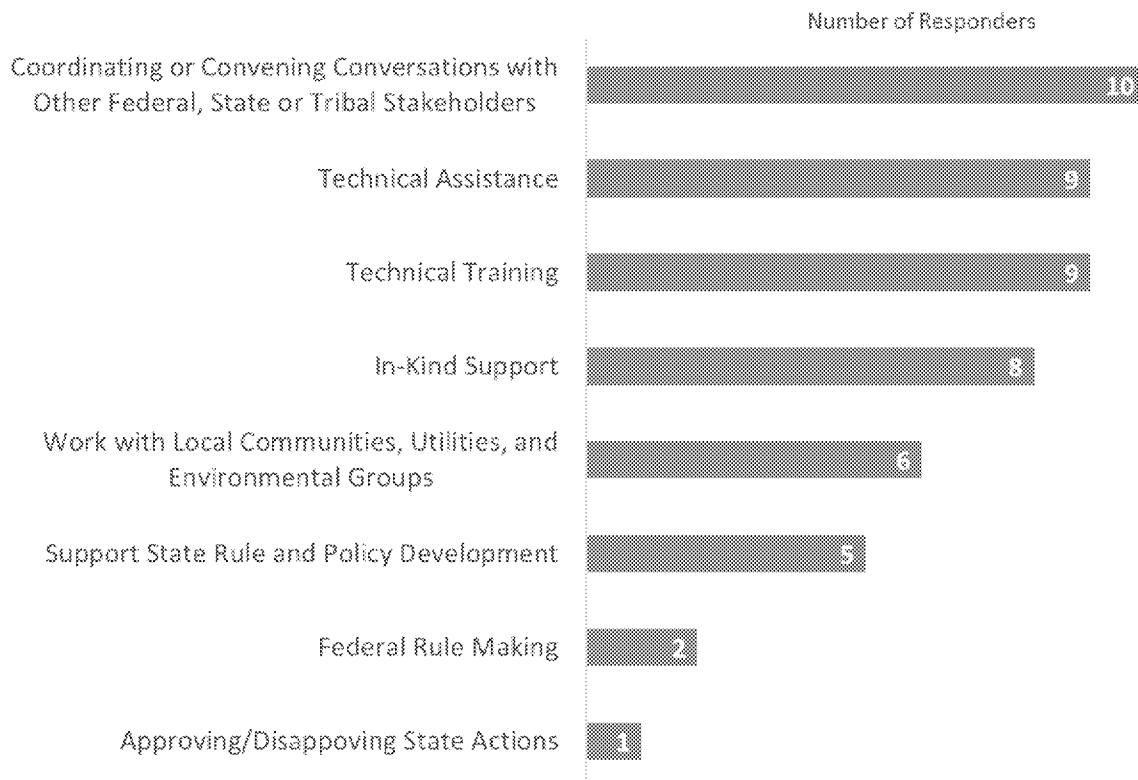
"Investing more time to work with Board staff to **understand region-specific issues** and demographic differences; Streamline administrative **NPS reporting requirements.**" -CA

"**Fill your vacancies** so you can help states." -CA

"EPA should include user-experience professionals in its **electronic-reporting projects** and early engagement and input of users in form designs." -CA

"US EPA should partner with the Board in development and enhancing strategies to implement **next generation new monitoring technology** in NPDES permits." -CA

Generally, would you like EPA Region 9 to increase our investments in the following efforts?



Sample Comments:*

"Participate in regional workshops and conferences; more opportunity to **collaborate with other states/regions** to share experiences; Finalize WOTUS and NPDES cleanup rule." -NV

"Be available as needed; Most **webinars are useful**." -HI

"Increase Federal efforts to revise **WET requirements** while providing additional toxicity technical support; Increase technical assistance for **stormwater financing** and asset management." -CA

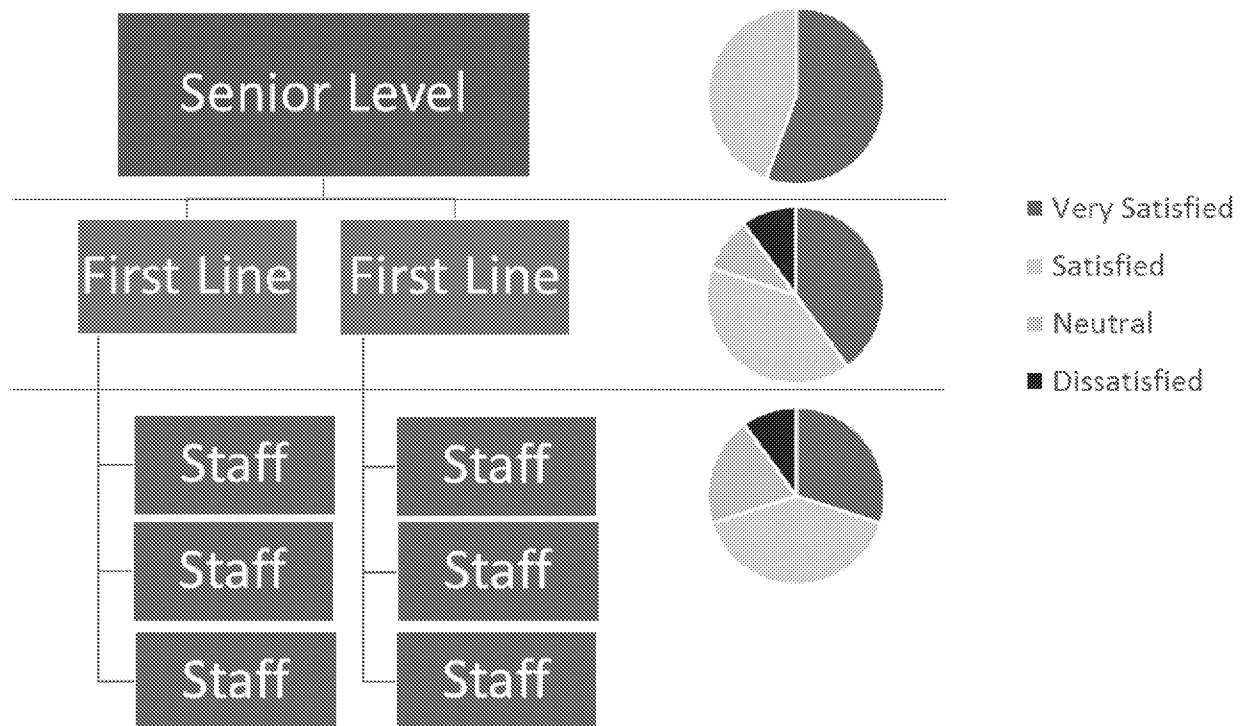
"Abide by comment deadlines for regulatory measures that will go to EPA for final approval; **In-kind funding** has been exceptionally useful for our NPDES Programs." -CA

"Collaborate more before just disapproving actions, especially where CA has primacy; Increase **cyano HAB** collaboration; Increase help with **cross-state issues** (CA-NV)" -CA

"Be present at controversial TMDL **stakeholder meetings** or Board hearings/workshops; Assist RB with **US Forest Service** TMDL compliance and **Army Corps** with 401 compliance." -CA

"Every area that EPA could increase its efforts and support of California programs would be welcome. More technical training in **Data management** and **pretreatment**." -CA

How satisfied are you with communication/coordination at the following levels of our organization?



Sample Comments:*

"We encourage R9 to maintain the liaison position in Nevada. **Stephanie Wilson** has been beneficial to both BWQP and BWPC." -NV

"Ensure both sides **review meeting agendas** in advance of quarterly meetings; **Staff attendance at the EOY Review** is important for them to understand importance of the work they do." -HI

"EPA is working with state to develop **more meaningful assessment metrics**." -CA

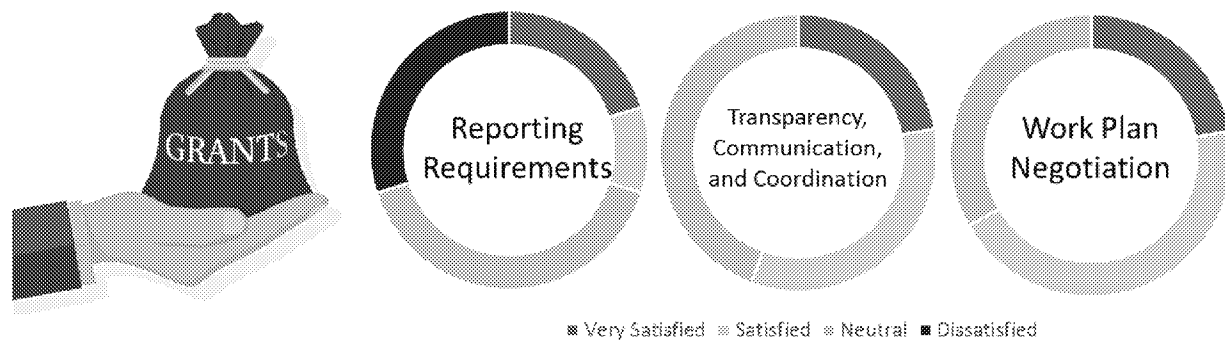
"Re-establish periodic **face-to-face** meetings with key programs and increased support through comment letters and at public hearings; Increase draft **permit review** and **MS4 audits**." -CA

"We still note **disconnects internally** at EPA R9 result in inconsistent messaging; Greater willingness to adopt **non-traditional approaches** would allow state to focus on broader picture." -CA

"Continue regular **annual meetings with each Regional Board**." -CA

"More **consistent participation** by EPA staff in pending Basin Plan and permitting actions is important." -CA

How satisfied are you with the following grant functions?



Sample Comments:*

"The more **certainty** we have with grant awards and timing, the better." -NV

"Environmental projects listed in **grant workplan** should be able to be **changed relatively quickly** as priorities are realigned." -HI

"Allow for **more flexibility** in how to use 319 grants including allocating more funds to planning efforts; **assist communities** navigate application process of federal grant and loan programs." -CA

"**Involve Regional Boards** more in discussion regarding allocation of 106 and 205(j)." -CA

"Generally, the 319 program has had a good experience working with EPA, however we **struggle with some of the limitations** placed by EPA on the program." -CA

"**In-kind contractor support** is well administered and very useful." -CA

"**Eligibility thresholds and reporting requirements** for some federal grant programs (e.g., 319(h)) place them out of reach." -CA

Training Requested:

Drinking Water:

- Lead and Copper Rule implementation
- Revised Total Coliform Rule implementation
- Sanitary surveys

Point Source:

- Stormwater BMP advances
- WW and SW permit writing
- Nutrient treatment
- NPDES Permits Writer Basic Training
- Advanced NPDES training on WQS implementation, mixing zones, and numeric effluent limits

Wetlands:

- Wetland delineation and mitigation,

Collaboration:

- Tribal engagement
- More online training

Action Items

To address priority areas of feedback, EPA is committing to specific actions:

- **Revisit Strategic Priorities.** As EPA begins their next Strategic Planning effort for FY 2019-2020, EPA will look to find ways to align and better support identified state priority program areas. Leading up to the development of the new strategic plan, EPA will consult with states on ways they can better support the identified priority areas:
 - Implementing TMDLs
 - Groundwater Protection
 - Agriculture
 - Capture, Recycling, and Reuse
 - Wastewater and Stormwater Infrastructure Financing
 - Domestic Wastewater and Stormwater Permitting
 - Source Water Protection

EPA will include an agenda item at their next quarterly, midyear, or EOY meetings with each state on ways to better support the above programs. Potential considerations would be to offer training, provide additional technical support, or assign EPA staff or management leads to priority program areas.

- **Attention to Low Satisfaction.** From the 11 respondents across 12 program areas, we received 102 program-specific evaluations. Of those 102 evaluations, EPA received 9 total “dissatisfied” ratings. Water Division managers will follow-up with counterparts in each of those programs to assess why the ratings were given and how we could improve to support those programs. In addition to the dissatisfied ratings, EPA received 29 “neutral” ratings. At the discretion of program managers, EPA may follow-up with individual programs to see how we can improve in those areas.
- **Leverage Training Resources.** EPA currently offers a variety of training opportunities to our states across many program areas. EPA will build on training currently offered by expanding regional trainings to include more state partners, collaborating with states to assess highest priority technical training needs, and working with national counterparts to leverage additional resources for state training. Through Quarterly, Midyear, and End of Year meetings, EPA will poll states to ensure highest priority program training needs are being met.

Trainings will be offered regularly in all program areas using headquarters, contractor, state, or in-house instructors and presenters. Regional training may also be offered to other regulatory partners (e.g., Tribes, Territories, USDA, Army Corps).

In addition to providing support to states, the training will also serve to train EPA staff and convene multiple state and regional partners for peer-to-peer learning.

- **Initiate Water Directors Summit.** In addition to convening and training staff, EPA will explore facilitating a regular executive summit of Regional Water Directors to discuss challenges facing water programs across the Pacific Southwest. The summit may include Clean Water and/or Drinking Water directors and be broken into both plenary and breakout sessions for specific topics or programs. The meeting may include Federal, State, Tribal, and Territory executives within the region, or combined with another region. EPA will follow-up with states to discuss what format of summit may be most helpful.
- **Streamline Grant Reporting.** EPA will work with each state to improve the reporting process. In particular, EPA is committed to supporting meaningful reporting. Key R9 activities to address this issue include:
 - **Arizona:** Participate in Kaizen Event with ADEQ on 5-Year Nonpoint Source Work Plan; Administer new multi-media Performance Partnership Grant.
 - **California:** Conduct a thorough review of the non-point source reporting cycle from start to finish in order to identify opportunities to streamline and improve process efficiencies.
 - **Hawaii:** Improve EPA Grant Application and Administration Guidance to better clarify requirements and expectations.
- **Reconsider Ability to Offer In-Kind Support.** In early 2018, EPA indicated that, due to resource constraints, it will no longer be offering in-kind contract support to states beginning in FY20. As part of the survey, states which are currently utilizing in-kind contracts managed by EPA indicated that they are reliant on this support to issue and manage their NPDES permitting programs. Consequently, EPA will reassess its ability to offer in-kind support to states. In addition, EPA will work with states to find other ways to support programs losing support from EPA-managed contracts.